Remarks

Claims 1-7 are pending in the Application. Claim 1 has been amended to make it more clear that the sequence for searching is variable and is determined by at least one variable factor. Support for this Amendment can be found, for example, on page 3, lines 15-18, and page 4, line 14 through page 5, line 6. No new matter has been added by this amendment.

The Applicant acknowledges the rejection under 35 U.S.C. § 102 over White. White describes a system for routing calls to an internet service provider ("ISP") through a telecommunication network. Under the White system, the general public contacts the ISP by calling a dial-up number, which the Official Action characterizes as a virtual address. When the dial-up number is called, the call is suspended and, unbeknownst to the caller, a group of lines is queried until an available line to the ISP is found. This group of lines is called a "hunt group" and is characterized in the Official Action as a set of real addresses.

White does not describe or suggest any particular order in which the hunt group lines are to be queried. Further, White does not describe or suggest that the sequence for querying the hunt group lines be variable or that the sequence be determined by a variable factor.

In sharp contrast, according to the present invention, when a virtual address is contacted, real addresses are searched in a sequence that is determined by at least one variable factor. For example, the variable that determines the sequence could be the time of day of the communication or the type of communication. By using a variable factor to determine the sequence of the real addresses to be searched, the invention provides a means to contact a party using a single virtual address for any form of communication at any given time by the most efficient method.

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As explained in the Specification at page 4, starting at line 14, the virtual address can be contacted regardless of the time. Thus, the time of day can be a variable that is used to determine the sequence to search real addresses. For example, if the communication occurs during normal business hours, a sequence can be determined that first attempts to contact a real address at the receiving party's place of employment. On the other hand, if the call is being placed after normal business hours, a sequence can be determined that first attempts to contact a real address at the party's home. In either event, if the initial contact attempt with the receiving party is not successful, different real addresses, in order from most likely to be successful to least likely to be successful at that particular time of day, can be tried until the receiving party is reached. In this example, the variable that determines the sequence by which real addresses are tried is the time of day.

Another variable that can be utilized to determine the sequence of real addresses to be searched is the form of communication. As set forth in the Specification on page 3, lines 15-18, the invention relates to the use of all forms of communications, such as voice communications, which may involve fixed or mobile telephones and IP voice protocols, or data communications, such as fax, telephone messaging, electronic messaging, file transfer via modem, etc. Thus, if a fax is to be sent to the receiving party, the sequence for searching real addresses can start with an appropriate fax number. In this example, the variable that determines the sequence for searching real addresses is the form of communication.

It is also possible to use more than one variable to determine the sequence of the real addresses to be searched. For example, at any particular time of day, a particular searching sequence may be used for a voice communication, such as by attempting to contact the receiving party using

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real addresses in order of a first fixed telephone, a second fixed telephone, a mobile telephone, IP voice protocol, and by telephone messaging. At the same time of day, a data message may be sent by first searching real addresses in a different sequence, for example, by attempting a fax number, e-mail, and then modem. The searching sequence for either type of message can also differ depending on the time of the day. Thus, the invention provides a means by which a receiving party can be contacted with a single virtual address for any form of communication at any time of day using the most efficient means available.

As noted above, Claim 1 has been amended to make more clear this distinction between the invention and that shown in White. White does not describe or suggest searching hunt lines or real addresses in a sequence that is determined by a variable factor. Instead, White sequentially attempts to connect to each hunt line, and if all hunt lines are unreachable, can reroute the call through an alternative ISP. (It is worth noting that if the latter contingency occurs, there is also no description or suggestion in White to search multiple alternative ISP in a sequence that is determined by a variable.) Therefore, it is respectfully submitted that Claims 1-6 are patentable over White.

Claims 7 is directed to a communication device that includes, among other things, means for modeling optimal sequences for a multiplicity of telecommunications supports. This is a means plus function element, which must be interpreted for purposes of patentability as being limited to the corresponding structure, materials or acts described in the Specification or equivalence thereof. MPEP § 2181. As explained above, the Applicant's Specification describes how optimal sequences are determined based on one or more variables. For the reasons already set forth, White does not describe or suggest determining the sequence of hunt group lines or real addresses to be contacted

based on a variable. For reasons similar to those applicable to claims 1-6, it is respectfully submitted that Claim 7 is patentable over White.

In light of the foregoing remarks, reconsideration and withdrawal of all objections and rejections are requested. The Applicants respectfully submits that the Application is now in condition for allowance, which Application respectfully requested.

Respectfully submitted,

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